

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

- against -

Docket No. 25-CR-182 (RPK)

LORI ZENO, *et ano.*,

Defendants.

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DEFENDANT'S RESPONSE (LETTER)
(TO GOVERNMENT'S MOTION TO MODIFY CONDITIONS OF BAIL)

Anthony L. Ricco, Esq.
Attorney For *Lori Zeno*
20 Vesey Street, Suite 400
New York, New York 10007
(212) 791-3919

ANTHONY L. RICCO

Attorney At Law

20 VESEY STREET, SUITE 400

NEW YORK, NEW YORK 10007

TEL. (212) 791-3919 FAX. (212) 791-3940

October 6, 2025

By ECF

The Honorable Rachel P. Kovner
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: ***United States v. Lori Zeno,***
Docket No.: 25-CR-182 (RPK)

Dear Judge Kovner:

I have had an opportunity to review the Government's Letter of September 22, 2025, and Pretrial Services Response Letter of September 30, 2025. The Government is requesting that this Court modify Lori Zeno's bail conditions to include (1) Zeno being placed on standalone electronic monitoring; (2) Zeno not contacting any vendor about any purchase made on behalf of the Organization that is, *inter alia*, the subject of the instant indictment; and (3) that Zeno be subject to cyber monitoring of her electronic devices to ensure compliance with the conditions of her pretrial release.

Pretrial Services, on the other hand, is recommending "the Court impose GPS stand-alone monitoring with specific locations the defendant must avoid and no restrictions to her residence." Pretrial Services has been involved in Lori Zeno's day-to-day activities. Pre-Trial Services has worked directly with ensuring that Lori Zeno participate in her much needed mental health guidance

and counseling and have developed an important relationship that has helped Lori Zena emotionally recover from a set of circumstances that has served to destroy her professional career. As a result, I give great deference to Pre-Trial Services's judgment and wisdom to make an assessment of Lori Zeno's risk of flight, and potential risk of danger, if any, to our community, and therefore respect their belief that Lori Zeno's 'recent conduct can be *further* addressed by this Court reminding Lori Zeno of the potential consequences she could face if there are any continued acts of misjudgment on her part.' Accordingly, I join Pre-Trial Services' conclusions and recommendations.

Respectfully submitted,

Anthony L. Ricco

Anthony L. Ricco
Attorney for Lori Zeno

cc via ECF:

Clerk of the Court
AUSA Russell Noble
AUSA Sean M. Sherman

CC via Email:

Mallori A. Brady
Intensive Supervision Specialist

Joseph Elie
Pretrial Services Officer